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March 1, 2018

**BY ECF**

Honorable P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Tucker, et al.**  
**16 CR 91 (PKC)**

Dear Judge Castel:

We write to request an adjournment of our due date to respond to the Government's February 9, 2018 forfeiture submission, D.E. 334. As the Court may recall, on February 13, 2018, we wrote to Your Honor requesting both the opportunity to respond to the Government's submission and requesting an additional two weeks from the February 16, 2018 due date. The Court granted our requests and ordered that the defendant's response would be due on March 2, 2018. We now request an additional two weeks to respond to the Government's submission for the following reasons.

On February 14, 2018, we were informed by Mr. Tucker that he had arrived at Grady County Jail in Chickasha, Oklahoma. We were able to set up an e-mail account with the jail's e-mail system and began to exchange messages with Mr. Tucker. On February 15, 2018, we informed Mr. Tucker that we had received an additional two weeks to respond to the Government's forfeiture submission and asked him to call the following week to discuss. He did not call and we have not heard from him since. On February 20, 2018, we were informed by Mr. Tucker's wife that the Grady County Jail was on "lockdown" and that Mr. Tucker had not been permitted to use the phone or the e-mail system. Then on February 26, 2018, Mrs. Tucker informed us that Mr. Tucker had been moved to the Oklahoma City/Marshals facility and is awaiting another move. He will likely be moved to Kansas City so he may appear in his District of Kansas criminal matter.

Because we have not been able to communicate with Mr. Tucker since February 16, 2018 and he is currently still in transit, we request an adjournment of two weeks to respond to the Government's February 9, 2018 forfeiture submission to March 16, 2018. The Government, by AUSA Niketh Velmaoor, does not object to this request.

Respectfully,

/s/ Lee A. Ginsberg

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Lee A. Ginsberg